

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 15-35(2) (RHK/HB)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	MOTION TO MODIFY CONDITIONS
v.)	AND TERM OF SUPERVISED RELEASE
)	
(2) ALAGIE BARROW,)	
)	
Defendant.)	

Defendant Alagie Barrow moves to modify his conditions of supervised release in keeping with the modifications ordered by this Court with respect to his codefendant Cherno Njie and coconspirator, Papa Faal, 15-28 (RHK), Doc. No. 95. In particular, Mr. Barrow requests that Special Conditions (e) (computer access and supervision), (g) (financial supervision), (h) (material reflecting extremist views), and (j) (polygraph testing) be stricken and that his supervised release term be commuted, such that it will expire in six months, provided that there are no supervision violations in the interim.

The Court ordered these modifications on behalf of Messrs. Njie and Faal based on the change in government in the Gambia since sentencing, the strong support of the defendants from the new government of the Gambia, the fact that the defendants have no criminal record other than this case, and the fact that they are in compliance with their conditions of supervised release. All of these same rationales apply with full force to Mr. Barrow.

In particular, undersigned counsel has spoken to Probation Officer Abby Kurtis in the Middle District of Tennessee, where Mr. Barrow is under courtesy supervision on behalf of the District of Minnesota. Ms. Kurtis indicated that Mr. Barrow has complied with all of the

conditions of his supervised release, and she has no objection to the early termination of his release term. (Ms. Kurtis did note that Mr. Barrow has not yet paid his \$200 special assessment.)

The government, per Assistant United States Attorney Charles Kovats has indicated that it has no objection to this motion.

Dated: June 15, 2017

Respectfully submitted,

s/ Robert D. Richman
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